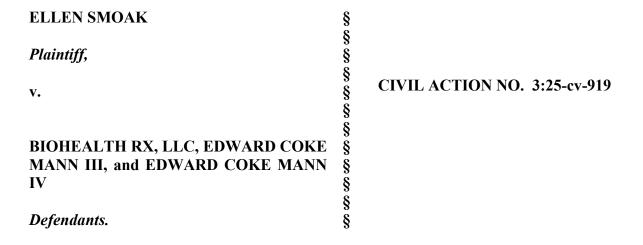
# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION



# PLAINTIFF'S AGREED MOTION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT EDWARD COKE "BUD" MANN III'S MOTION TO DISMISS UNDER RULE 12(b)(2)

#### TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Ellen Smoak files this agreed motion to further extend the deadline to respond to Defendant Edward Coke "Bud" Mann III's Motion to Dismiss for Lack of Personal Jurisdiction under Rule 12(b)(2) of the Federal Rules of Civil Procedure, and respectfully shows the Court as follows:

#### I. BACKGROUND

- 1. Defendant Bud Mann filed his Rule 12(b)(2) motion on April 28, 2025.
- 2. On May 15, 2025, the parties entered into a stipulation resolving Defendant's Rule 12(b)(5) motion and permitting jurisdictional discovery concerning Defendant's 12(b)(2) motion. The stipulation provided that Plaintiff's response would be due sixty (60) days after entry of the stipulation.

3. Defendant served verified discovery responses on June 16, 2025. The follow-up deposition of Defendant Bud Mann took place on July 9, 2025, shortly after the stipulated discovery window closed due to scheduling constraints.

4. On July 9, 2025, Plaintiff filed her first agreed motion to extend the response deadline by one week-from July 15 to July 22, 2025. The Court granted that motion.

5. Since that time, defense counsel requested additional time to explore potential resolution of the case through settlement discussions. In light of that request and to facilitate ongoing negotiations, Plaintiff respectfully requests a further extension of the response deadline.

6. Accordingly, Plaintiff now seeks to extend the deadline to respond to the 12(b)(2) motion by an additional three weeks-from July 22, 2025, to August 12, 2025.

7. Counsel for Defendant Bud Mann has confirmed that Defendant does not oppose the relief requested herein.

8. This is Plaintiff's second agreed extension request, and it is not sought for delay but to promote efficiency, facilitate settlement discussions, and further the interests of justice.

9. This motion is made subject to and without waiver of any defenses, objections, or rights of either party, including those relating to jurisdiction.

#### II. PRAYER

10. WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court grant this agreed motion and extend her deadline to respond to Defendant Bud Mann's Motion to Dismiss under Rule 12(b)(2) to August 12, 2025, and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

### **FARMER & COKER, PLLC**

By: /s/ Kaitlyn M. Coker

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### ATTORNEYS FOR PLAINTIFF

#### ACCEPTED AND AGREED AS TO FORM AND SUBSTANCE:

### ADAMS AND REESE LLP

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# ATTORNEY FOR DEFENDANT EDWARD COKE MANN III

### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(b), I certify that on June 23, 2025, and again on July 11, 2025, I conferred via email with Craig Wilcox, counsel for Defendant Edward Coke "Bud" Mann III, who confirmed that his client does not oppose the relief requested in this motion.

/s/ Kaitlyn M. Coker KAITLYN M. COKER

### **CERTIFICATE OF SERVICE**

I certify that on July 22, 2025, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all counsel of record.

/s/ Kaitlyn M. Coker KAITLYN M. COKER